## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SHEA DEVELOPMENT CORP., et al.,	)
Plaintiffs,	)
v.	) 1:07-CV-11201 (DLC)
CHRISTOPHER WATSON, et al.,	)
Defendants.	)

## MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Michael E. Twomey, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Applicant's Name:

Stephen E. Baril

Firm Name:

Williams Mullen, PC

Address:

1021 East Cary Street, 17th Floor

City/State/Zip:

Richmond, Virginia 23219

Phone Number:

804.643.1991

Fax Number:

804.783.6507

Stephen E. Baril is a member in good standing of the Bar of the Commonwealth of Virginia. There are no pending disciplinary proceedings against Stephen E. Baril in any State or Federal court.

Dated: New York, NY June 24, 2008

Respectfully submitted,

Michael E. Twomey (MT 7839)

Twomey, Hoppe & Gallanty, LLP

757 Third Avenue New York, NY 10017

Tel: 212-688-0400 Fax: 212-688-1929

Attorneys for Plaintiffs

To:

James E. Davies, Esq. Landman Corsi Ballaine & Ford, PC 120 Broadway, 27<sup>th</sup> Floor New York, NY 10271

Attorneys for Defendant Christopher Watson

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## AFFIDAVIT OF MICHAEL E. TWOMEY IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

STATE OF NEW YORK	)
COUNTY OF NEW YORK	) ss.:

Michael E. Twomey, being duly sworn, hereby deposes and says as follows:

- I am a partner at Twomey, Hoppe & Gallanty, LLP, counsel for plaintiffs, Shea 1. Development Corp., Bravera, Inc. and IP Holding of Nevada Corp. (the "Plaintiffs"), in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiffs' motion to admit Stephen E. Baril as counsel pro hac vice to represent plaintiff in this matter.
- I am a member in good standing of the bar of the State of New York, and was 2. admitted to practice law in 1975. I also am admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
- I have worked with Williams Mullen, a Richmond, Virginia, law firm, on other 3. matters, including matters in this Court, for many years.
  - Stephen E. Baril is a partner at Williams Mullen. 4.
- I have found Mr. Baril to be a skilled attorney and a person of integrity. He is 5. experienced in Federal practice and is familiar with the Federal Rules of Procedure.

- 6. Accordingly, I am pleased to move the admission of Stephen E. Baril, pro hac vice.
- I respectfully submit a proposed order granting the admission of Stephen E. Baril, 7. pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Stephen E. Baril, pro hac vice, to represent Plaintiffs, Shea Development Corp., et al., in the above captioned matter, be granted.

Sworn to before me this day of June, 2008

GARY HOPPE 1622724v Notary Public, State of New York No. 31-4754194 Qualified in New York County



## VIRGINIA STATE BAR

# CERTIFICATE OF GOOD STANDING

This is to certify that STEPHEN EARL BARIL is an active member of the Virginia State Bar in good standing.

MR. BARIL was licensed to practice law in Virginia on MAY 13, 1980, after successfully passing the bar examination

given by the Virginia Board of Bar Examiners.

Count bour

Karen A. Gould

Chief Operating Officer Executive Director and

Issued June 23, 2008

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Defendants.	)

## ORDER FOR ADMISSON PRO HAC VICE ON WRITTEN MOTION

Upon the motion and affidavit of Michael E. Twomey, attorney for plaintiffs, Shea Development Corp., et al., and sponsor attorney,

### IT IS HEREBY ORDERED that

Stephen E. Baril Applicant's Name: Firm Name: Williams Mullen, PC

Address: 1021 East Cary Street, 17<sup>th</sup> Floor City/State/Zip: Richmond, Virginia 23219

Phone Number: 804-643-1991

Fax Number: 804-783-6507

Email Address: sbaril@williamsmullen.com; mmccarroll@williamsmullen.com

is admitted to practice pro hac vice as counsel for plaintiffs, Shea Development Corp., et al., in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: New York, NY June , 2008

United States District/Magistrate Judge